



136-20 38th Ave., #11G
Flushing NY 11354
+ 1 (607) 948 - 3339
contact@jzhanglaws.com

Dated: April 12, 2023

VIA ECF

Honorable Jennifer L. Rochon
United States District Court, S.D.N.Y.
40 Foley Square, Courtroom 20B
New York, New York 10007

Re: Jiangsu Huari Webbing Leather Co., Ltd. v. Joes Identified in Schedule A
Case No. 1:23-cv-02605-JLR
Letter Requesting Extension of the TRO, and rescheduling show cause hearing

Dear Judge Rochon,

We represent Plaintiff, Jiangsu Huari Webbing Leather Co., Ltd (“Plaintiff”) in the above-referenced action. On April 4, 2023, the Court granted Plaintiff’s Application, and issued a temporary restraining order; an order restraining the Defendants’ websites and Defendants’ assets with Amazon.com; an order to show cause why a preliminary injunction should not issue; and an order authorizing expedited discovery (the “TRO”). The Court also set a date of April 11, 2023 for Defendants to serve any opposing paper on Plaintiff’s counsel with respect to the preliminary injunction.

We have served the copy of TRO with Defendants’ information list to Amazon.com, eBay.com, Wayfair.com, Walmart.com and Alibaba.com (hereinafter, collectively referred as “Platforms”) by overnight FedEx mail on April 5, 2023. As of April 12, 2023, the Platforms are still processing to comply with the TRO and need additional time to serve the Defendants.

Further, since the Platforms have not responded to Plaintiff’s counsel and provided the Defendants’ contact information, therefore, the Defendants are unlikely to be fairly notified of the April 17, 2023 hearing.

The TRO expires next Tuesday, April 18, 2023, See Fed. R. Civ. P. 65(b)(2). For the reasons set forth in this application, Plaintiff respectfully submits that there is cause for extending the TRO and rescheduling the order to show cause hearing on why a preliminary injunction should not be issued (i.e., May 2, 2023).

We thank the Court for its time and attention to this matter.

Dated April 12, 2023
Queens, New York

Respectfully submitted.

/s/ Jiyuan Zhang

Jiyuan Zhang, Esq
J. Zhang and Associates, P.C,
136-20 38th Avenue, # 11G,
Flushing, NY 11354
607-948-3339
contact@jzhanglaws.com

Steven Fairchild, Esq
Fairchild Law LLC
292 Powers St Suite 1B,
Brooklyn, NY 11211